

Marie-Ann Greenberg, MAG-1284
Marie-Ann Greenberg, Standing Trustee
30 TWO BRIDGES ROAD
SUITE 330
FAIRFIELD, NJ 07004-1550
973-227-2840
Chapter 13 Standing Trustee

IN RE:
RICHARD B MOORE

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Case No.: 20-22758JKS

HEARING DATE: 01/28/2021

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed plan respectfully objects as follows:

- The Debtor has failed to provide or has provided a deficient valuation of the Debtor's property to the Standing Trustee, and is not cooperating with the Trustee in violation of 11 U.S.C. Section 521(a)(3).
Specifically, Internet Valuation is not sufficient.
- The Debtor's Disposable Income has not been pledged for the entire Applicable Commitment Period in violation of 11 U.S.C. Section 1325(b)(1)(B).
Specifically, need end date on debtor's 401k loan.
- Debtor has failed to provide proof of income.
The debtor has failed to provide proof of current income. A paystub from debtor's employer dated no later than two weeks prior to the 341 date must be submitted.
- Co-debtor / non filing spouse has failed to provide proof of income.
Specifically,
need current paystubs and 5/1/20 paystub from Universal Protection Job.
Specifically,
Failed to provide proof of current income. A paystub from employer dated no later than two weeks prior to the 341 date must be submitted.
Failed to provide proof of income for the six months preceding the filing of this case.
- An amended Schedule E should be filed prior to confirmation of this matter.
Schedule E fails to list DSO Recipient Address.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 plan in its present form be denied.

Dated: December 16, 2020

By: /S/Marie-Ann Greenberg
Marie-Ann Greenberg, Esquire
Chapter 13 Standing Trustee